

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

**[PROPOSED] ORDER GRANTING
DEFENDANTS' MOTION
OBJECTING TO THE SPECIAL
MASTER'S ORDER DENYING
DEFENDANTS' MOTION TO
COMPEL INSPECTION OF DR.
WILLIAM LONGO'S
LABORATORY**

THIS MATTER having been brought before the Court by Defendants Johnson & Johnson and LLT Management, LLC ("Defendants") for an order vacating the Special Master's June 17, 2024 Order denying Defendants' Motion to Compel Inspection of Dr. William Longo's Laboratory (ECF 32826), and ordering Plaintiffs to make Dr. Longo's Laboratory available for inspection; and the Court having considered the moving papers; and for good cause shown;

IT IS on this _____ day of _____, 2024 hereby

ORDERED as follows:

1. Special Master's June 17, 2024 Order denying Defendants'

Motion to Compel Inspection of Dr. William Longo's Laboratory (ECF 32826) is hereby **VACATED**; and

2. Plaintiffs shall make the following available for inspection:
 - A. All PLM microscopes used by MAS at 3945 Lakefield Ct, Suwanee, GA 30024 for its analysis of the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024);
 - B. MAS's methodology for preparing the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024) for subsequent analysis by PLM for the identification of "chrysotile," including but not limited to observing in real time the preparation of one or more samples of Johnsons Baby Powder performed by MAS; and
 - C. MAS's methodology for analyzing the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024) for analysis by PLM for the identification of "chrysotile," including but not limited to observing in real time the analyses performed by MAS on the samples of Johnsons Baby Powder, as well as Defendants' experts undertaking real time, contemporaneous observation of the samples on the same PLM equipment used by MAS in which MAS has previously reported, and may during the inspection report, observing "chrysotile."

Hon. Michael A. Shipp, U.S.D.J.